



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AFM
F. #2016R02228

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 28, 2020

By Email and ECF

Andrew J. Frisch
One Penn Plaza, Suite 5315
New York, NY 10119

Re: United States v. Aleksandr Zhukov
Criminal Docket No. 18-633 (S-1) (EK)

Dear Mr. Frisch:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, consisting of the following material:

- **ZHU006440** – Finalized translations of certain Bulgarian bank records.
- **ZHU006441** - Finalized translations of certain Latvian bank records
- **ZHU006437** – The contents of the defendant's iPad, to which the government recently gained access.

The following material produced under cover of this letter is designated **sensitive discovery material** pursuant to the protective order issued by the Court on July 31, 2019.

- **ZHU006436** - Data pertaining to a Google email account under the defendant's control
- **ZHU006439** – Data provided by Maxmind.

The following material produced under cover of this letter is designated **attorneys' eyes only** pursuant to the protective order issued by the Court on July 31, 2019:

- **ZHU006438** - Records produced by Platform-6, as designated in the government's production of December 30, 2019.

In addition, the government notes that it previously produced to you a spreadsheet containing information from DoubleVerify (Bates number ZHU000267

produced June 11, 2019). The underlying data for the spreadsheet is available for examination and copying. If you wish to examine or copy that data, please contact us to arrange us to arrange a mutually convenient time and place.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Alexander Mindlin
Alexander Mindlin
Assistant U.S. Attorney
(718) 254-6433

Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)